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Pro Bono Attorneys for Plaintiffs,
Esvin Fernando Arredondo Rodriguez and A.F.A.J.

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

ESVIN FERNANDO ARREDONDO
RODRIGUEZ INDIVIDUALLY AND
A.F.A.J., A MINOR, BY HER GUARDIAN
AD LITEM, JEFFREY HAMILTON,

Plaintiffs,

v.

UNITED STATES OF AMERICA,

Defendant.

Case No.: CV 22-02845-JLS-AFM

**NOTICE OF MOTION FOR
DOCUMENT PRODUCTION
AND ENTRY OF PROTECTIVE
ORDER**

**[DISCOVERY DOCUMENT:
REFERRED TO MAGISTRATE
JUDGE ALEXANDER F.
MACKINNON]**

Date: April 11, 2023

Time: 10:00 AM

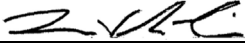
Judge: Alexander F. MacKinnon

Pursuant to Local Rule 37, on April 11, 2023, or as soon thereafter as counsel can be heard, Plaintiffs Esvin Fernando Arredondo Rodriguez (“Mr. Arredondo Rodriguez”) and his minor daughter A.F.A.J. (together, “Plaintiffs”) will motion the Court to order Defendant, the United States of America, to produce all documents and materials listed in its Rule 26 Disclosure dated February 9, 2023, including but not limited to all materials produced in the other Federal Tort Claims Act cases pending in Federal Courts across the country. Plaintiffs further move the Court to issue a protective order in the form customarily issued by Magistrate Judge Alexander F. MacKinnon. The parties’ respective positions are set forth in the Joint Stipulation filed on March 15, 2023 pursuant to Local Rule 37-2 (Document No. 40). Plaintiffs’ proposed protective order is attached as Exhibit G to the Joint Stipulation.

Dated: March 20, 2023

Respectfully Submitted,

MILBANK LLP

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